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MEMO ENDORSED

Application GRANTED,
to the extent
that the
deadline is
extended

VIA Fax # (212) 805-7906

April 2, 2008

HONORABLE U.S. JUDGE DENNY CHIN

Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1020
New York, N.Y. 10007

Re: *El Sayed v. Hilton USDC Southern District of New York*
Case No. 07 CV 11173
Request for Adjournment and Extension of Time
Defendants' Motion for Partial Summary Judgment
Motion Return Date April 11, 2008

four weeks
from April 11, 2008,
to May 9,
2008. FINAL.
Defendants'
to reply
time is also extended
four weeks.
SO ORDERED.

Dear Judge Chin:

Please be advised that I am the attorney for the Plaintiff, **WALID EL SAYED**, in the above-entitled action. I respectfully ask that the motion, returnable April 11, 2008, be adjourned to a date of in the latter part of May 2008, or a time thereafter as can be scheduled for the following reason:

As Your Honor may be aware, my client Walid El Sayed sought a prior adjournment for a medical absence to aide his father in Cairo, Egypt, while his father underwent eye surgery. Upon my client's return to New York, he has been overwhelmed and focused on bringing his father to the U.S., wherein his father would receive better medical treatment, and my client is searching to obtain a eye specialist in New York City (since no competent specialist can be located in Egypt) for the restoration of the vision in his father's left eye - the vision in the right eye has already deteriorated beyond repair and his father is now blind. As noted in my March 7, 2008 letter to Your Honor, the medical report of the Plaintiff's father indicates retinal hemorrhaging, which required immediate surgical attention. Mr. El Sayed's father would receive better medical treatment here in the U.S., and my client has completely interrupted his entire personal life to seek help for his father to restore his eyesight if possible. Enclosed herewith are the medical reports obtained by Mr. El Sayed, during his short stay in

[Signature]
WSDS 4/4/08

The Honorable Judge Denny Chin
April 2, 2008
Page 2 of 3

Cairo, Egypt with his father.

Further, I am experiencing my own delays since I am in the midst of packing and moving my offices to another location in the city at 240 Madison Ave, New York, New York 10016. The packing has already begun as of this letter, and the move is scheduled for the middle of next week -after which time I will have to unpack and get settled in my new office space. I assure Your Honor that the choice to move could not be helped, and the decision had to be made rather abruptly. I apologize to the Honorable Court and my adversary for any inconvenience caused by my own personal delay. As you know I am a solo practitioner, and I am basically fixed for time to move.

Pursuant to Your Honor's individual rules, this is the second request for an extension in this matter, and one prior request for an extension has been put forth and granted on this motion in Your Honor's response and approval of the extension on or about March 8, 2008. Further, it is to be noted that I am sending a copy of this letter to my adversary in this matter in lieu of pre-approved consent to this request.

It is to be noted that I have called Nicole Saldana, Esq. of the law firm of Jackson Lewis today at 5:19 PM, and I spoke to her law assistant, Wayne Reiss, in this matter. Mr. Reiss informed me that she was in the office but unavailable. Mr. Reiss put me through to Ms. Saldana's voice mail, and I indicated on the record, pursuant to His Honor's rules that I request consent of an adjournment from my adversary due to the reasons as set forth above.

and I am basically fixed for time to move
It is now 6:30 PM, and I have not received a call back from my adversary. I did leave my cell phone (646) 981-7918, and my office number (212) 532-3255, for Ms. Saldana with a message to call me back. There are no other schedules to which this adjournment and extension request will affect.

Since I am unable to ascertain whether my adversary desires to speak with me, I am submitting this request letter in compliance with all other procedures of Your Honor's individual practices. I respectfully ask that the Defendants' Motion for partial summary judgment, returnable April 11, 2008, be set returnable to Your Honor's Court in the latter part of May 2008, or soon thereafter, 1) further extending my client's request for family leave for medical expediency of having his father treated in the U.S. to restore his eyesight to the one remaining right eye, which is still repairable at this point;

pursuant to His Honor's rules that I request consent

The Honorable Judge Denny Chin
April 2, 2008
Page 3 of 3

and 2) for the delays that I am experiencing in my representation of my client due to an abrupt move to a new office space. It is to be noted that this is a final request for adjournment to respond as to the motion for partial summary judgment.

Thanking Your Honor for Your consideration and courtesy in this matter.

Respectfully yours,


MARTIN S. STREIT

MSS:hk
Enclosures

cc: Via Fax # (212) 972-3213
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